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January 22, 2015

VIA ECF & FACSIMILE 212 805-7986

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: *Grant, et al. v. Warner Music Group Corp et al.*
 No. 13 Civ. 4449 (PGG)
 Henry, et al. v. Warner Music Group Corp et al.
 No. 13 Civ. 5031 (PGG)

Dear Judge Gardephe,

This firm, along with Leeds Brown LLP, and Maurice Pianko, Esq. represent Plaintiffs in the above-referenced wage and hour actions. I write on behalf of all parties to inform the Court of the status of our settlement efforts, and to respectfully request 45 additional days to move for preliminary approval of the settlement agreement.

On November 17, 2014, the parties reported that they had reached an agreement on the basic parameters of a class-wide settlement, subject to working out additional terms and subject to documentation. In my December 23, 2014 letter to you, I requested a 30-day adjournment of the deadline for Plaintiffs to publish Court-authorized so that the parties could draft the settlement documents, and submit them to this Court for approval. It was our goal to publish a single notice that would encompass the terms of the proposed settlement, as well as provide notice regarding the FLSA portion of this lawsuit. In light of the complexities of the settlement, and the intervening holidays, it appears our 30 day filing request was a bit ambitious.

The parties have agreed upon the substantive terms of settlement which have been memorialized in a term sheet. Moreover, we have drafted initial versions of the settlement agreement and release, publication order, final order, notice of settlement and claim form, and expect to exchange them with Defendants' counsel by close of business tomorrow. The details of the settlement are somewhat complex, and it has taken us a little longer than anticipated to resolve



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a few legal and procedural issues, including settlement administration. We now expect to complete the drafting process in the next couple of weeks so that our motion for preliminary approval will be effectuated by March 9, 2015. As indicated by today's filings, counsel for Defendants have recently relocated to a new firm, and this requested extension also takes into account any administrative challenges that may be occasioned by that move.

Respectfully submitted,

/s/Lloyd R. Ambinder

cc: Lyle Zuckerman, Esq. (via email)
Jeff Brown, Esq. (via email)
Maurice Pianko, Esq. (via email)